

EXHIBIT G

From: Shabalov, Anna
Sent: Thursday, December 21, 2017 2:51 PM
To: Mayle, Ted; Verdini, Christopher M.; McElhinny, Patrick; Knedeisen, Mark G.; Angelis, Theo; slov0002@umn.edu; ryang001@umn.edu; Sobolak, Rachael C.
Cc: Sipiора, David; lremele@bassford.com; asayler@bassford.com; LSI-UMN
Subject: RE: Regents of the University of Minnesota v. LSI Corporation, No. 0:16-cv-02891-WMW-SER (D. Minn.)
Attachments: UMN v. LSI_ 12.21.2017 A. Shabalov Letter to E. Mayle.PDF

Ted,

Attached please find a response to your December 13th letter.

Happy holidays!
Anna

From: Shabalov, Anna
Sent: Wednesday, December 20, 2017 1:51 PM
To: 'Mayle, Ted'; Verdini, Christopher M.; McElhinny, Patrick; Knedeisen, Mark G.; Greenswag, Douglas B.; Angelis, Theo; slov0002@umn.edu; ryang001@umn.edu; Sobolak, Rachael C.
Cc: Sipiора, David; lremele@bassford.com; asayler@bassford.com; LSI-UMN
Subject: RE: Regents of the University of Minnesota v. LSI Corporation, No. 0:16-cv-02891-WMW-SER (D. Minn.)

Ted,

Thanks for the update. We will get you a written response to your December 13th letter on initial disclosures as soon as possible.

Anna

From: Mayle, Ted [<mailto:TMayle@kilpatricktownsend.com>]
Sent: Wednesday, December 20, 2017 12:46 PM
To: Shabalov, Anna; Verdini, Christopher M.; McElhinny, Patrick; Knedeisen, Mark G.; Greenswag, Douglas B.; Angelis, Theo; slov0002@umn.edu; ryang001@umn.edu; Sobolak, Rachael C.
Cc: Sipiора, David; lremele@bassford.com; asayler@bassford.com; LSI-UMN
Subject: RE: Regents of the University of Minnesota v. LSI Corporation, No. 0:16-cv-02891-WMW-SER (D. Minn.)

Anna,

Further to our email chain below, we served yesterday an additional product specification from the TrueStore line. "TrueStore RC9700 Series McLaren Read Channel Custom Channel Macro" (see LSI-UMN 00079138-81243). I'm still checking to see if earlier versions of any of the product specifications that were already produced exist; but you now have product specifications for all of the part numbers that arguably have any relevance. I understand that the "McLaren Cyan" is the earliest product that arguably has any relevance here. (We deny that this or any other TrueStore product can infringe, or has infringed, any of the asserted method claims).

Finally, I'm following up on my question below about the supplementation of the University's Initial Disclosure document production. Can we expect an answer in writing to my letter of December 13 to Chris (see attached)?

Thanks,
Ted

Ted Mayle

Kilpatrick Townsend & Stockton LLP

Suite 600 | 1400 Wewatta Street | Denver, CO 80202

office 303 607 3368 | fax 303 265 9618

tmayle@kilpatricktownsend.com | [My Profile](#) | [vCard](#)

From: Mayle, Ted

Sent: Monday, December 18, 2017 10:31 PM

To: Shabalov, Anna <Anna.Shabalov@klgates.com>; Verdini, Christopher M. <Christopher.Verdini@klgates.com>; McElhinny, Patrick <Patrick.McElhinny@klgates.com>; Knedeisen, Mark G. <Mark.Knedeisen@klgates.com>; Greenswag, Douglas B. <Doug.Greenswag@klgates.com>; Angelis, Theo <theo.angelis@klgates.com>; slov0002@umn.edu; ryang001@umn.edu; Sobolak, Rachael C. <Rachael.Sobolak@klgates.com>

Cc: Sipiora, David <dsipiora@kilpatricktownsend.com>; lremele@bassford.com; asayler@bassford.com; LSI-UMN <LSI-UMN@kilpatricktownsend.com>

Subject: RE: Regents of the University of Minnesota v. LSI Corporation, No. 0:16-cv-02891-WMW-SER (D. Minn.)

Thank you Anna.

Your email seems largely correct. One small change with respect to your paragraph about "Accused Devices" and similar definitions. I told Chris on our call that the TrueStore product line is the only one that is relevant for this case. So you can remove that issue from your list. We are following up on the other issues in your email and will get back to you.

One final point, Chris had committed to supplementing the University's Initial Disclosure document production based on the points in our letter, but had reserved the right to disagree on some points. Can you give us an update on your position, and let us know when to expect a supplemental document production?

Finally, thank you again for agreeing to reach out again before filing any discovery motions. Happy holidays to you and your team and families.

Best Regards,
Ted

Ted Mayle

Kilpatrick Townsend & Stockton LLP

Suite 600 | 1400 Wewatta Street | Denver, CO 80202

office 303 607 3368 | fax 303 265 9618

tmayle@kilpatricktownsend.com | [My Profile](#) | [vCard](#)

From: Shabalov, Anna [<mailto:Anna.Shabalov@klgates.com>]

Sent: Monday, December 18, 2017 6:42 PM

To: Mayle, Ted <TMayle@kilpatricktownsend.com>; Verdini, Christopher M. <Christopher.Verdini@klgates.com>; McElhinny, Patrick <Patrick.McElhinny@klgates.com>; Knedeisen, Mark G. <Mark.Knedeisen@klgates.com>; Greenswag, Douglas B. <Doug.Greenswag@klgates.com>; Angelis, Theo <theo.angelis@klgates.com>; slov0002@umn.edu; ryang001@umn.edu; Sobolak, Rachael C. <Rachael.Sobolak@klgates.com>

Cc: Sipiora, David <dsipiora@kilpatricktownsend.com>; lremele@bassford.com; asayler@bassford.com; LSI-UMN <LSI-UMN@kilpatricktownsend.com>

Subject: RE: Regents of the University of Minnesota v. LSI Corporation, No. 0:16-cv-02891-WMW-SER (D. Minn.)

Ted,

I am writing to confirm what we discussed during our December 14th meet and confer call regarding Defendants' discovery responses.

You confirmed that Defendants are not withholding any information or documents based on their objection that the University's definitions of "Accused Device," "Accused Simulators," "Component," "Computer Instruction Information," "MTR encoder," "MTR-encoded waveform," and "MTR code" are vague and ambiguous. You also represented that it is your understanding that TrueStore is Defendants' sole product line that contains an "MTR encoder" as defined by the University. Now that you have the University's claim construction charts, you are going to follow-up with Defendants (1) to confirm that TrueStore is the sole product line that contains the accused technology; (2) to determine whether there are additional relevant part or series numbers beyond those specified in the University's complaint and initial claim chart and (3) to investigate and collect pre-2015 product specifications for products in the TrueStore line, to the extent they exist. Please let us know by December 29 the results of your investigation.

Additionally, you are going to review with Defendants the list of types of documents showing the operation of the Accused Devices identified in the University's RFP No. 4 to determine whether Defendants have such documents. Likewise, you are continuing to investigate the volume of documents identified in the University's RFP Nos. 14, 17-19, and intend to provide us "all" requested documents from a category if the volume is not unreasonable. If Defendants content that providing "all" documents of a particular category would create an undue burden, we request a meet and confer to discuss the issue. Again, please let us know by December 29 the results of this investigation.

On our end, we are considering your offer to identify the date of first manufacture for each Accused Product, in lieu of the University's broader requests for pre-"Potential Damages Period" information relating to the date of the hypothetical negotiation. We will give you our position by December 29.

Finally, the University intends to file a motion to compel production of documents that Defendants are withholding on the basis of the following objections: (1) information and documents regarding actions and products outside the U.S., including what you characterize as worldwide sales data, are not relevant and not discoverable; (2) information and documents outside of the so-called "Potential Damages Period" that you claim are not relevant and not proportional to the needs of the case; (3) references to the Moon 1996 IEEE Paper, Moon, the University or MTR coding that do not also reference the '601 Patent that you claim are not relevant and not proportional to the needs of the case; and (4) information and documents regarding Defendants' consideration of MTR code that you claim are not relevant and not proportional to the needs of the case.

As we discussed, neither party believes the informal discovery dispute resolution mechanism is appropriate in this circumstance, so the motion to compel will be formally submitted. We will coordinate with you to schedule the hearing date for mid-to-late January, and anticipate that briefing on the motion to compel will occur in January.

Please be in touch if any of the above summary is not in accord with your understanding of our discussion.

Thanks,
Anna

From: Mayle, Ted [<mailto:TMayle@kilpatricktownsend.com>]

Sent: Wednesday, December 13, 2017 8:34 PM

To: Shabalov, Anna; Verdini, Christopher M.; McElhinny, Patrick; Knedeisen, Mark G.; Greenswag, Douglas B.; Angelis, Theo; slov0002@umn.edu; ryang001@umn.edu; Sobolak, Rachael C.

Cc: Sipiora, David; lremele@bassford.com; asayler@bassford.com; LSI-UMN

Subject: RE: Regents of the University of Minnesota v. LSI Corporation, No. 0:16-cv-02891-WMW-SER (D. Minn.)

Dear Counsel:

Please see the attached correspondence in advance of our meet and confer tomorrow.

Thank you.

Ted

Ted Mayle

Kilpatrick Townsend & Stockton LLP

Suite 600 | 1400 Wewatta Street | Denver, CO 80202

office 303 607 3368 | fax 303 265 9618

tmayle@kilpatricktownsend.com | [My Profile](#) | [vCard](#)

From: Shabalov, Anna [<mailto:Anna.Shabalov@klgates.com>]

Sent: Monday, December 11, 2017 10:30 AM

To: Mayle, Ted <TMayle@kilpatricktownsend.com>; Verdini, Christopher M. <Christopher.Verdini@klgates.com>; McElhinny, Patrick <Patrick.McElhinny@klgates.com>; Knedeisen, Mark G. <Mark.Knedeisen@klgates.com>; Greenswag, Douglas B. <Doug.Greenswag@klgates.com>; Angelis, Theo <theo.angelis@klgates.com>; slov0002@umn.edu; ryang001@umn.edu; Sobolak, Rachael C. <Rachael.Sobolak@klgates.com>

Cc: Sipiора, David <dsipiora@kilpatricktownsend.com>; lremele@bassford.com; asayler@bassford.com; LSI-UMN <LSI-UMN@kilpatricktownsend.com>

Subject: RE: Regents of the University of Minnesota v. LSI Corporation, No. 0:16-cv-02891-WMW-SER (D. Minn.)

Ted,

How about this Thursday at 3pm eastern / 1pm mountain for the meet and confer? We can use the following dial-in:

1-855-886-4157

Code: 444-8966

Thanks,
Anna

From: Mayle, Ted [<mailto:TMayle@kilpatricktownsend.com>]

Sent: Friday, December 08, 2017 6:18 PM

To: Shabalov, Anna; Verdini, Christopher M.; McElhinny, Patrick; Knedeisen, Mark G.; Greenswag, Douglas B.; Angelis, Theo; slov0002@umn.edu; ryang001@umn.edu; Sobolak, Rachael C.

Cc: Sipiора, David; lremele@bassford.com; asayler@bassford.com; LSI-UMN

Subject: RE: Regents of the University of Minnesota v. LSI Corporation, No. 0:16-cv-02891-WMW-SER (D. Minn.)

Anna,

We are open for a meet and confer next week, preferably Wednesday or Thursday afternoon (Mountain Time). You also asked for verification of the Interrogatory responses by today. That is not going to be possible due to schedule conflicts, but we will provide the verifications as soon as possible.

Regards,
Ted

Ted Mayle

Kilpatrick Townsend & Stockton LLP

Suite 600 | 1400 Wewatta Street | Denver, CO 80202

office 303 607 3368 | fax 303 265 9618

tmayle@kilpatricktownsend.com | [My Profile](#) | [vCard](#)

From: Shabalov, Anna [<mailto:Anna.Shabalov@klgates.com>]

Sent: Wednesday, December 06, 2017 1:28 PM

To: Mayle, Ted; Verdini, Christopher M.; McElhinny, Patrick; Knedeisen, Mark G.; Greenswag, Douglas B.; Angelis, Theo; slov0002@umn.edu; ryang001@umn.edu; Sobolak, Rachael C.
Cc: Sipiora, David; lremele@bassford.com; asayler@bassford.com; LSI-UMN
Subject: RE: Regents of the University of Minnesota v. LSI Corporation, No. 0:16-cv-02891-WMW-SER (D. Minn.)

Ted,

Please see the attached correspondence regarding Defendants' responses.

Thanks,
Anna

From: Mayle, Ted [<mailto:TMayle@kilpatricktownsend.com>]
Sent: Monday, November 27, 2017 10:01 PM
To: Verdini, Christopher M.; McElhinny, Patrick; Knedeisen, Mark G.; Shabalov, Anna; Greenswag, Douglas B.; Angelis, Theo; slov0002@umn.edu; ryang001@umn.edu; Sobolak, Rachael C.
Cc: Sipiora, David; lremele@bassford.com; asayler@bassford.com; LSI-UMN
Subject: RE: Regents of the University of Minnesota v. LSI Corporation, No. 0:16-cv-02891-WMW-SER (D. Minn.)

Counsel:

Defendants' responses to the University's Amended First Request for Production and Amended First Set of Interrogatories are attached. As discussed earlier today, Defendants will produce documents tomorrow.

Best Regards,
Ted

Ted Mayle
Kilpatrick Townsend & Stockton LLP
Suite 600 | 1400 Wewatta Street | Denver, CO 80202
office 303 607 3368 | fax 303 265 9618
tmayle@kilpatricktownsend.com | [My Profile](#) | [vCard](#)

From: Verdini, Christopher M. [<mailto:Christopher.Verdini@klgates.com>]
Sent: Thursday, October 26, 2017 1:57 PM
To: Mayle, Ted; Sipiora, David; lremele@bassford.com; asayler@bassford.com; LSI-UMN
Cc: McElhinny, Patrick; Knedeisen, Mark G.; Verdini, Christopher M.; Shabalov, Anna; Greenswag, Douglas B.; Angelis, Theo; slov0002@umn.edu; ryang001@umn.edu; Sobolak, Rachael C.
Subject: Regents of the University of Minnesota v. LSI Corporation, No. 0:16-cv-02891-WMW-SER (D. Minn.)

Counsel:

I have attached the University's Amended First Request for Production of Documents and Amended First Set of Interrogatories directed to Defendants.

Chris



Christopher M. Verdini
K&L Gates LLP

K&L Gates Center
210 Sixth Avenue
Pittsburgh, PA 15222
Phone: 412-355-6766
Fax: 412-355-6501
christopher.verdini@klgates.com
www.klgates.com

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